

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-30004-MAP
	)	
ROOSEVELT ARCHIE,	)	
Defendant.	)	
	)	

**MOTION TO ENLARGE TIME FOR FILING OF GOVERNMENT'S RESPONSE TO  
DEFENDANT'S MOTION TO SUPPRESS**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests this Court to enlarge the time for filing of the government's response to Defendant's Motion to Suppress Evidence from March 4, 2005 to March 18, 2005.

In support of this motion, the government states the following:

1. There have been recent developments with respect to the Defendant, including significant plea negotiations between the Defendant and the government, which make it is much more likely as of today's date, March 3, 2005, that this case will be resolved short of trial, and that the Defendant's evidentiary motions would be withdrawn.
2. The undersigned Assistant U.S. Attorney's competing caseload has prevented the government's response by March 5, 2005, as the government needs more time to

review the above captioned case, meet with the case agent, and respond to the Defendant's discovery motion. In addition, the supervising case agent in this matter was unavailable for a period following the Defendant's submission of his Motion to Suppress Evidence. This fact has made it difficult to prepare a response to Defendant's motions.

The Defendant, through Attorney Vincent Bongiorno, consents to this motion requesting additional time. This request does not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: s/s Paul Hart Smyth

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Paul Hart Smyth  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
March 4, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by facsimile on March 4, 2005, to Attorney Vincent Bongiorno.

s/s Paul Hart Smyth  
Paul Hart Smyth  
Assistant U.S. Attorney